

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**MLCJR LLC, *et al.*,**<sup>1</sup>

## Debtors

## Chapter 7

**Case No. 23-90324 (CML)**

## Jointly Administered

**NINTH MONTHLY STATEMENT OF SERVICES RENDERED AND EXPENSES  
INCURRED FOR THE PERIOD ENDING JANUARY 31, 2025 BY STEWART ROBBINS  
BROWN & ALTAZAN, LLC AS COUNSEL TO THE TRUSTEE**

Stewart Robbins Brown & Altazan LLC (“SRBA”), proposed counsel for Michael D. Warner, solely in his capacity as chapter 7 trustee (the “Trustee”) for the above-captioned administratively consolidated estates (collectively, the “Estates”), hereby submits this Ninth Monthly Fee Statement for Services Rendered and Expenses Incurred (the “Monthly Fee Statement”) for the period ending January 31, 2025 (the “Statement Period”), in accordance with the Court’s *Order Granting Trustee’s Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee’s Professionals* [Docket # 1831] establishing interim compensation procedures (the “Interim Compensation Order”). In support of the Monthly Fee Statement, SRBA respectfully represents as follows:

<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: MLCJR LLC (0875); Cox Oil Offshore, L.L.C. (7047); Cox Operating, L.L.C. (0939); Energy XXI GOM, LLC (0027); Energy XXI Gulf Coast, LLC (8595); EPL Oil & Gas, LLC (9562); and M21K, LLC (3978). The Debtors' address is 4514 Cole Ave. Suite 1175, Dallas, Texas 75205.

SRBA respectfully submits this Monthly Fee Statement seeking compensation for reasonable, actual and necessary services and expenses rendered by SRBA on behalf of the Trustee during the Statement Period:

STATEMENT PERIOD SUMMARY	
Name of Applicant:	Stewart Robbins Brown & Altazan LLC
Applicant's Role in Case:	Chapter 7 Trustee's General Counsel
Date of Retention:	June 12, 2024 (Doc. 2116) retroactive to May 6, 2024
Period Covered by this Statement:	Jan 1, 2025 through Jan 31, 2025
Number Monthly Fee Statements:	Ninth
STATEMENT PERIOD SUMMARY OF FEES AND EXPENSES	
Total Statement Period Fees	\$216,810.00
Total Interim Fees (80%) Requested	\$173,448.00
Total Expenses Requested	\$4,214.56
Total Interim Remuneration Requested (exclusive of holdback):	\$177,662.56
STATEMENT PERIOD SUMMARY FOR ATTORNEYS	
Total attorney fees requested in this statement:	\$210,210.00
Total actual attorney hours covered by this statement:	386.70
Average hourly rate for attorneys:	\$500.34
STATEMENT PERIOD SUMMARY FOR PARAPROFESSIONALS	
Total paraprofessional fees requested in this statement:	\$6,600.00
Total actual paraprofessional hours covered by this statement:	22
Average hourly rate for paraprofessionals:	\$300.00

**In accordance with the *Order Granting Trustee's Motion for Order Establishing Interim Compensation Procedures for the Trustee and the Trustee's Professionals* [Docket no. 1831], each party receiving notice of the monthly fee statement will have until 5:00 p.m. (Prevailing Central Time), 10 days after the filing of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 10-day period, the Trustee is authorized to pay the professional the amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.**

1. The following chart presents certain information regarding the SRBA professionals whose work on these chapter 7 cases compensation is sought in this Monthly Fee Statement sorted by professional, along with each professionals' title, earliest bar passage (if applicable), highest rate, blended rate, total amount billed, and percentage of billings:

Professional	Title	Date Initial Bar License	Total Time	Blended Rate	Highest Rate	Total Amount Billed	Percentage Billed
Brandon A. Brown	Member	LA - 1998	28.20	\$616.67	\$650.00	\$17,365.00	8.01%
Brooke W. Altazan	Member	LA - 2009	23.20	\$517.19	\$550.00	\$11,960.00	5.52%
Kimberly A. Heard	Paralegal	N/A	22.00	\$300.00	\$300.00	\$6,600.00	3.04%
Nicholas J. Smeltz	Associate	LA - 2019	19.90	\$408.82	\$450.00	\$8,025.00	3.70%
Paul D. Stewart, Jr.	Member	LA - 1996	136.50	\$615.85	\$650.00	\$85,265.00	39.33%
William S. Robbins	Member	LA - 1996	75.30	\$589.13	\$650.00	\$46,780.00	21.58%
Abigail W. Mock	Associate	LA - 2024	49.90	\$240.00	\$400.00	\$13,040.00	6.01%
Jamie D. Cangelosi	Of Counsel	LA - 2000	53.70	\$514.71	\$550.00	\$27,775.00	12.81%
<b>Grand Total</b>			<b>408.70</b>	<b>\$480.13</b>	<b>\$650.00</b>	<b>\$216,810.00</b>	<b>100.00%</b>

2. The following chart provides a summary of fees incurred during the Statement Period sorted by ABA bankruptcy task code, along with the total time, percentage of time, total billed amount, and percentage of amount for each task:

Task	Total Time	Percent of Time	Total Amount	Percent of Amount
b110 Case Administration	1.3	0.32%	\$670.00	0.31%
b120 Asset Analysis and Recovery	0.1	0.02%	\$40.00	0.02%
b130 Asset Disposition	328.5	80.38%	\$176,715.00	81.51%
b140 Relief from Stay/Adequate Protection	1.9	0.46%	\$760.00	0.35%
b150 Meeting of and Comm with Creditors	2.5	0.61%	\$1,250.00	0.58%
b160 Fee/Employment Applications	6.6	1.61%	\$2,620.00	1.21%
b180 Avoidance Analysis	0.2	0.05%	\$130.00	0.06%
b190 Other Contested Matters	52.2	12.77%	\$25,890.00	11.94%
b210 Business Operations	2.9	0.71%	\$1,150.00	0.53%
b220 Employee Benefits/Pensions	1.9	0.46%	\$1,225.00	0.57%
b230 Financing Cash Collections	9.9	2.42%	\$5,940.00	2.74%
b310 Claims Administration and Objections	0.7	0.17%	\$420.00	0.19%
<b>Grand Total</b>	<b>408.7</b>	<b>100.00%</b>	<b>\$216,810.00</b>	<b>100.00%</b>

3. The following chart provides a summary of expenses incurred during the Statement Period sorted by category of expenses:

SUMMARY OF EXPENSES	
Expense Description	Expenses Amount
Copies	\$1,609.20
Pacer	\$125.20
Corporate Records	\$1.00
EDI Costs	\$811.96
Filing Fee	\$338.00
Work Travel	\$416.60
(blank)	\$912.60
<b>Grand Total</b>	<b>\$4,214.56</b>

4. SRBA's invoice covering the Statement Period and providing a detailed statement of both (a) hours spent rendering legal services to the Trustee and (b) disbursements made or incurred by SRBA in connection with services performed on behalf of the Trustee during the Statement Period is attached hereto as **Exhibit "A"**.

5. Pursuant to the Interim Compensation Order, SRBA seeks payment of \$177,662.56 from the Trustee for the Statement Period, representing (a) 80% of SRBA's total fees for services rendered and (b) 100% of the total expenses incurred during the Statement Period.

6. Although every effort has been made to include all fees and expenses incurred during the Statement Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Statement Period. SRBA reserves the right to seek allowance of such fees and expenses not included herein.

Dated: June 11, 2025

Respectfully Submitted,

**STEWART ROBBINS BROWN  
& ALTAZAN, LLC**

By: /s/Paul Douglas Stewart, Jr.  
Paul Douglas Stewart, Jr. (La. Bar # 24661)  
*Admitted to Southern District of Texas*  
*(SDTX Federal No. 432642)*  
[dstewart@stewartrobbins.com](mailto:dstewart@stewartrobbins.com)  
William S. Robbins (Tx. Bar # 24100894)  
[wrobbins@stewartrobbins.com](mailto:wrobbins@stewartrobbins.com)  
Brandon A. Brown (Tx. Bar # 24104237)  
[bbrown@stewartrobbins.com](mailto:bbrown@stewartrobbins.com)  
Brooke W. Altazan (Tx. Bar # 24101002)  
[baltazan@stewartrobbins.com](mailto:baltazan@stewartrobbins.com)  
301 Main Street, Suite 1640  
Baton Rouge, LA 70801-0016  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467

***Counsel for Michael D. Warner,  
Chapter 7 Trustee***

**MLCJR LLC, *et al.***  
**EXHIBIT A**

**DETAILED TIME AND EXPENSE ENTRIES**  
**Time Period – January 1, 2025 – January 31, 2025**



301 Main Street, Suite 1640  
Baton Rouge, LA 70821  
225-231-9998

Michael D. Warner  
440 Louisiana Ave., Suite 900  
Houston, TX 77002  
USA

May 21, 2025

File #: 119-001  
Invoice #: 1647

**RE:** In re MLCJR LLC & M21K, LLC

DATE	DESCRIPTION	Task	LAWYER	HOURS	AMOUNT
1/1/2025	Review correspondence from T. Bevolo re: CTG payment status	B130	BAB	0.10	60.00
1/2/2025	review and analyze Devon / Chase Trust agreement and related correspondence; conference with Devon counsel regarding same; email from Chase regarding bank documents and account	B130	WSR	1.20	720.00
1/2/2025	email to/from Mr. Zimmerman regarding Array / GOM NDA	B210	WSR	0.40	240.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with Firm and client.	B130	PDS	3.10	1,860.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and SRBA Team.	B130	PDS	1.30	780.00
1/2/2025	Research, revise motion to relinquish, terminate, and abandon.	B130	JDC	0.20	100.00
1/2/2025	Revise motion to abandon naked title retained under sale to NRW (2.3); review and research cases supporting abandonment in light of Midlantic (2.6)	B130	BAB	4.90	2,940.00
1/2/2025	Prepare for and participate in telephone conference with counsel for Devon re: account possibly subject to trust agreement (0.6); analyze issues raised by Devon counsel and path moving forward (0.5)	B130	BAB	1.10	660.00
1/2/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner, SRBA Team, and E. Poitevent.	B130	PDS	2.20	1,320.00
1/2/2025	Correspondence from A. Carr re: document retention	B130	BWA	0.10	50.00
1/2/2025	Revising Trustee's Motion to Abandon and Relinquish	B130	AWM	3.00	600.00
1/3/2025	Receipt of R. Dykes final activity report for December; update payable spreadsheet; email to B. Dassa re same.	B210	KAH	0.20	60.00
1/3/2025	Receipt of invoices; prepare January payables spreadsheet.	B210	KAH	0.20	60.00
1/3/2025	Review orders granting SRBA fee app and Trustee fee app; update payables spreadsheet.	B160	KAH	0.20	60.00
1/3/2025	Attention to supplemental document production from A&M; download same.	B190	KAH	0.40	120.00

1/3/2025	emails and analysis regarding MT Abandon NRW interests (.5); Telephone conference with Mr. Dykes regarding NRW / Array / Vendor issues (.3)	B130	WSR	0.80	480.00
1/3/2025	Review and analyze Ryan NDA redlines (1.20); Review and analyze GOM Shelf NDA redlines (1.0)	B190	BWA	2.20	1,100.00
1/3/2025	Research, revise motion to relinquish, terminate, and abandon.	B130	JDC	3.70	1,850.00
1/3/2025	Further research re: abandonment in light of Midlantic and cases supporting same (2.7); review of and revisions to latest drafts of motion to abandon (2.6)	B130	BAB	5.30	3,180.00
1/3/2025	Analyze affect of Array purchase on abandonment motion and proof issues relating to same	B130	BAB	0.80	480.00
1/3/2025	Revising Trustee's Motion to Abandon and Relinquish t	B130	AWM	4.60	920.00
1/4/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and W. Robbins.	B130	PDS	3.10	1,860.00
1/4/2025	Correspondence from FileLink re: monthly invoice	B210	BWA	0.10	50.00
1/6/2025	Review payables specifically related to storage; emails re same.	B210	KAH	0.20	60.00
1/6/2025	Manage efforts re Miller v. Cox litigation and Trustee's response to discovery.	B190	PDS	0.10	60.00
1/6/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related Proposed Order and exhibits; and related communications with M. Warner, B. Brown, W. Robbins, and A. Mock.	B130	PDS	5.30	3,180.00
1/6/2025	revising correspondence to Nicholas Miller counsel re 30(b)(6) deposition	B190	NJS	0.20	80.00
1/6/2025	email to N. Walden and J. Morris (FBI) re asset recovery petition status	B120	NJS	0.10	40.00
1/6/2025	draft and revise certificate of no objection to TPS West first interim fee application; revise proposed order to same	B160	NJS	0.30	120.00
1/6/2025	circulating certificate of no objection to TPS West fee application, redlined and clean orders granting same to R. Anderson (TPS)	B160	NJS	0.20	80.00
1/6/2025	circulating certificate of no objection to TPS West fee application to trustee	B160	NJS	0.10	40.00
1/6/2025	Review and revise Motion to Abadon mere legal title for NRW assets (2.5); revising asset list for Motion to Abandon (1.7)	B130	WSR	4.20	2,520.00
1/6/2025	Communication with A. Carr re: abandoned equipment	B130	BWA	0.20	100.00
1/6/2025	Communication with M. Bishop (GOM Shelf) re: NDA (.20); Attention to settlement check for DOI (.30)	B190	BWA	0.50	250.00
1/6/2025	Attention to potential Hidden Assets employment	B160	BWA	0.10	50.00
1/6/2025	Analyzing documents from NRW PSA and creating exhibit for Trustee's Motion to Abandon and Relinquish	B130	AWM	3.50	700.00
1/6/2025	Revise Trustee's Motion to Abandon and Relinquish (3.0); Revise Trustee's Proposed Order (.9)	B130	AWM	3.90	780.00



1/6/2025	Follow up on third party document productions in response to subpoenas; related communications with J. Ormiston (1); review and analyze debtors' documents and emails, third party document productions (3.3); prepare for discovery conference with B. York (.2).	B130	JDC	4.50	2,250.00
1/6/2025	Review and revise latest drafts of motion to abandon legal title to NRW leases	B130	BAB	1.40	840.00
1/6/2025	Review and revise letter to counsel for N. Miller re: discovery issues	B190	BAB	0.50	300.00
1/6/2025	communication with R. Dykes re decommissioning orders	B130	PDS	0.10	60.00
1/6/2025	Attention to storage invoices	B210	BWA	0.70	350.00
1/7/2025	Finalize certificate of no objection and order granting TPS fee application.	B160	KAH	0.20	60.00
1/7/2025	Receipt of email requesting W-2; follow up emails concerning procedure for same.	B210	KAH	0.20	60.00
1/7/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related order (3.3) and related communications with M. Warner (.4).	B130	PDS	3.70	2,220.00
1/7/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner.	B130	PDS	1.30	780.00
1/7/2025	email to B. Altazan re employment application status	B160	NJS	0.20	80.00
1/7/2025	Review/analyze order approving SRBA employment	B160	NJS	0.10	40.00
1/7/2025	draft and revise notice of rate increase	B160	NJS	0.70	280.00
1/7/2025	Attention to and analysis of potentially hiring Hidden Assets	B160	BWA	0.30	150.00
1/7/2025	Analysis of and communication with GOM Shelf and Ryan re: NDA redlines	B190	BWA	1.20	600.00
1/7/2025	Analyzing A&M email production	B130	AWM	0.90	180.00
1/7/2025	Revising Trustee's Motion to Authority to Abandon and Relinquish	B130	AWM	1.80	360.00
1/7/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	3.20	1,600.00
1/7/2025	Review of latest version of letter to counsel for PI claimant re: discovery	B190	BAB	0.30	180.00
1/7/2025	Document searches re NRW per J. Cangelosi request.	B130	KAH	0.40	120.00
1/7/2025	Review Devon Bond issues (.4); review and analyze requested revisions to NDA from multiple parties (.5); review and analyze possible sale prospects and required pleadings (.8); emails and review of lien search (.5)	B130	WSR	2.20	1,320.00
1/8/2025	Attention to emails from Mimecast export and transfer to Everlaw.	B190	KAH	0.60	180.00
1/8/2025	review of, and comments and revisions to, MT Relinquish and Abandon and related communications with M. Warner and Chambers.	B130	PDS	3.40	2,040.00
1/8/2025	review of, and comments and revisions to, Notice of Abandonment and Notice of Rejection and related communications with M. Warner and W. Robbins.	B130	PDS	0.90	540.00

1/8/2025	Draft/revise 1.8.2025 Notice of Abandonment and related exhibit and related communications with W. Robbins, A. Mick, and M. Warner.	B130	PDS	1.30	780.00
1/8/2025	multiple communications with Team and opposing attorneys re subpoena.	B190	PDS	0.60	360.00
1/8/2025	communication with Opportune re subpoenas.	B190	PDS	0.40	240.00
1/8/2025	circulating proposed correspondence to Miller counsel re corporate deposition and recommendation re same	B190	NJS	0.70	280.00
1/8/2025	draft and revise motion to quash and motion for protective order from deposition notice	B190	NJS	2.90	1,160.00
1/8/2025	discussions with B. Brown re deposition notice and motion to quash issues	B190	NJS	0.20	80.00
1/8/2025	phone call with M. Warner and B. Brown re corporate deposition notice and motion to quash issues	B190	NJS	0.20	80.00
1/8/2025	email to C. Sonnier re corporate deposition notice issues	B190	NJS	0.10	40.00
1/8/2025	phone call with C. Sonnier re corporate deposition notice issues	B190	NJS	0.10	40.00
1/8/2025	circulating correspondence to N. Blanda (Nicholas Miller) re corporate deposition notice	B190	NJS	0.10	40.00
1/8/2025	Communication with Veritrust re: equipment destruction	B130	BWA	0.10	50.00
1/8/2025	Tc with Trustee regarding pending issues (.3); review / revise Notice of Abandonment (1.8); review various NDA issues (.5); review various oil and gas interests for abandonment (.9)	B130	WSR	3.50	2,100.00
1/8/2025	Analyzing A&M email production	B130	AWM	4.60	920.00
1/8/2025	Executing list of all state leases for abandonment motion (2.0); Updating ROWs/RUEs/Wells spreadsheet with the leases abandoned on 1.8.25 (.4)	B130	AWM	2.40	480.00
1/8/2025	Communications with client re: discovery letter, possible involvement of bankruptcy court (0.5); analyze need for bankruptcy court involvement and avenues for same (0.6)	B190	BAB	1.10	660.00
1/8/2025	Emails with M. Borrer re: holdback issues	B220	BAB	0.20	120.00
1/8/2025	Communications with N. Blanda re: deposition issues	B190	BAB	0.30	180.00
1/8/2025	Receipt and review of OG TPS west fee app	B160	BAB	0.10	60.00
1/8/2025	Attention to GOM NDA issues, communication with counsel and Trustee re: same (.80); Attention to Ryan NDA issues, communication with counsel re: same (.40)	B150	BWA	2.50	1,250.00
1/8/2025	Attention to Dallas office documents	B130	BWA	0.30	150.00
1/8/2025	Review and analyze debtors' documents and emails, third party document productions (4.3), related communications with E. Iannoti re: Moelis document production (.3), B. York re: NRW discovery responses, production (.4)	B130	JDC	5.30	2,650.00
1/8/2025	Attention to emergency motion issues and logistics	B130	BWA	1.30	650.00
1/9/2025	Prepare Notice of Hearing for MT Relinquish and Abandon	B190	KAH	0.30	90.00
1/9/2025	Finalize Notice of Rate Increase; emails related to same.	B160	KAH	0.20	60.00

1/9/2025	communication with interested parties re MT Relinquish and Abandon (.1); communication with B. Kadden re NRW assets (.1); communication with R. Shaddock and A. Greenbaum re MT Relinquish and Abandon (.5); communication with R. Kuebel re MT Relinquish and Abandon (.5) prepare for upcoming hearing on relinquishment and abandonment (2.5).	B130	PDS	3.70	2,220.00
1/9/2025	Prepare for and attend conference call re turnover and 2004 issues with M. Warner and K. Elmer.	B190	PDS	1.10	660.00
1/9/2025	draft and revise motion for clarification of stipulation providing Miller relief from the automatic stay	B140	NJS	1.90	760.00
1/9/2025	directions to paralegal re filing and serving notice of rate increase	B160	NJS	0.20	80.00
1/9/2025	Draft Notice of Abandonment	B130	AWM	0.30	60.00
1/9/2025	Communication with special purpose counsel and Trustee re: Dallas office/documents (.50); Communication with GOM counsel re: NDA, analysis of same (.40)	B110	BWA	0.90	450.00
1/9/2025	review and analysis of NRW / Abandonment pleadings and issues	B130	WSR	1.50	900.00
1/9/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	1.60	800.00
1/10/2025	communication with A. Mock, R. Dykes, and M. Warner re next notice of abandonment (.1); communication with L. Phillips (.2), W. Robbins (.4) and M. Warner (.3) re carve-out with Lenders; communication with R. Kuebel re predecessor interest in NRW assets (1.2); .	B130	PDS	2.20	1,320.00
1/10/2025	communication with B. Barriere and M. Warner re Underwriters' waiver of subrogation to Lenders.	B190	PDS	0.40	240.00
1/10/2025	continue drafting/revising motion for clarification of miller stipulation	B190	NJS	2.20	880.00
1/10/2025	Attention to carve out issues (1.5); attention to asset / purchase issues (.4); emails to/from W&T (.3); review various reports from Mr. Dykes (.5); emails to/from Trustee (.3); email to DIP Lender counsel regarding AFE request (.3)	B130	WSR	3.30	1,980.00
1/10/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	2.10	1,050.00
1/13/2025	Receipt of invoices and activity reports for January payables; update spreadsheet.	B160	KAH	0.30	90.00
1/13/2025	Analysis of MP72 and 73 to respond to AXIP inquiries	B130	NJS	1.10	440.00
1/13/2025	communication with M. Warner re NRW ownership issues and analysis of same (1.4); communication with R. Dykes re relinquishment and abandonment motion (.2); communication with B. Kadden re relinquishment and abandonment motion (.3); communication with M. Bishop re same (.1); communication with Interior re same (.1);	B130	PDS	1.80	1,080.00
1/13/2025	Correspondence from Kroll re: destruction of physical files	B130	BWA	0.10	50.00
1/13/2025	Review and analyze abandonment and NRW issues (.8); emails regarding asset issues (.3); emails to/from Mr. Dyles (.3); emails to/from W&T Counsel (.2)	B130	WSR	1.60	960.00

1/13/2025	Emails with M. Borrer re: holdback processing status, needs moving forward	B130	BAB	0.30	180.00
1/13/2025	Analyzing A&M email production re NRW.	B130	AWM	2.90	580.00
1/13/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	4.20	2,100.00
1/14/2025	Preparation for hearing on MT relinquish and abandon (3.0) and related communications with M. Warner (.2), Interior (.6) and R. Dykes (.5); analysis of discovery issues relating to MT relinquish and abandon and related communications with litigation team (1.7); communication with A. Mendez re settlement of MT relinquish and abandon (.2).	B130	PDS	6.20	3,720.00
1/14/2025	continue drafting/revising motion to clarify stipulation with N. Miller modifying automatic stay	B190	NJS	3.70	1,480.00
1/14/2025	Review/analyze W&T sale order to determine disposition of assets inquired about by AXIP	B130	NJS	0.50	200.00
1/14/2025	Analysis of Kroll's email re: destruction of physical files	B130	BWA	0.90	450.00
1/14/2025	Communications with R. Dykes re Notice of Abandonment	B130	AWM	0.20	40.00
1/14/2025	Conducting Secretary of State business search on opposing party	B130	AWM	0.30	60.00
1/14/2025	Draft witness and exhibit list for Trustee's emergency motion to relinquish and abandon, research and analyze evidentiary issues.	B130	JDC	5.40	2,700.00
1/14/2025	Communications with N. Blanda re: letter on 30b6 deposition notice	B190	BAB	0.30	180.00
1/14/2025	Review information/claims data provided by Kroll in anticipation of their destruction of documents.	B130	KAH	0.20	60.00
1/14/2025	Prepare subpoena to NRW; telephone calls with process servers re service of same.	B130	KAH	0.60	180.00
1/14/2025	Review relinquish/abandon motion for exhibits for hearing; pull exhibits.	B130	KAH	0.40	120.00
1/14/2025	Pull additional documents as possible exhibits for hearing on abandonment motion.	B130	KAH	0.70	210.00
1/14/2025	Conducting research re NRW motion	B130	AWM	0.40	80.00
1/14/2025	Communication with Mr. Dykes regarding NRW and other issues (.4); emails and review of materials from W&T (.8); forward lien search information (.2); teleconference with W&T regarding purchase (.3); analysis of NRW assets without burdens (.5); follow up teleconference with Mr. Dykes (.2); analysis of asset sale issues and email to trustee regarding same (2.2); response to VESCO attorney (.2); review JPMorgan/Chase response to turnover (.5)	B130	WSR	5.80	3,480.00

1/15/2025	Teams call with J. Ormiston, M. Bishop and W. Robbins re GOM Shelf opposition to relinquishment and abandonment and related communications with M. Warner (1.3); preparation for and attendance on call with NRW and counsel re potential settlement options and plan moving forward (2.1); communication with L. Phillips, M. Warner, and M. Jones re Highlander Energy XXI deal (.8); call with R. Kuebel re predecessors' issues relating to relinquishment (.5).	B130	PDS	5.70	3,420.00
1/15/2025	conference with GOM Shelf counsel regarding emergency motion (.5); analysis of related issues (.7); tc with Matt Jones and review of proposed agreement (.5); analysis of carveout issues(.3); conference with NRW counsel and principal regarding emergency motion (.8); analysis of motion / abandonment issues (2.7)	B130	WSR	5.50	3,300.00
1/15/2025	Revise witness and exhibit list for Trustee's emergency motion to relinquish and abandon (.3); review and analyze debtors' documents and emails, third party document productions, related communications with K. Saindon re: A&M document production (1.7).	B130	JDC	2.00	1,000.00
1/15/2025	Prepare for and participate in telephone conference with PI counsel for N. Miller re: discovery issues (0.9); communication with client re: same (0.1)	B190	BAB	1.00	600.00
1/15/2025	Telephone conference with S. Thomas re: Genesis admin claim (0.2); receipt and review of motion to withdraw same (0.2); review filed notice of withdrawal (0.1); communication to client re: same (0.2)	B310	BAB	0.70	420.00
1/15/2025	email to S. Seilheimer (AXIP) re asset abandonment	B130	NJS	0.30	120.00
1/15/2025	phone call with B. Brown and N. Blanda (Miller counsel) re discovery for Mr. Miller's district court suit	B190	NJS	0.30	120.00
1/15/2025	email to M. Warner re discussions with Miller counsel concerning discovery for district court suit	B190	NJS	0.20	80.00
1/15/2025	Receipt of A&M native data emails; download and storage of same.	B130	KAH	0.20	60.00
1/15/2025	Continue pulling possible pleadings/documents to be used as exhibits for MT Relinquish/Abandon hearing; emails related to same.	B130	KAH	0.40	120.00
1/15/2025	Attention to CIMA document production	B130	KAH	0.20	60.00
1/15/2025	Conducting research re NRW motion	B130	AWM	3.20	640.00
1/16/2025	Gathering employee information for other Cox litigation.	B190	KAH	0.60	180.00
1/16/2025	Attention to proposed carveout arrangement with Lenders and related communications with L. Phillips and M. Warner.	B230	PDS	1.20	720.00
1/16/2025	Call with R. Chaddick and A. Greenbaum re relinquishment motion (.3) communication with T. Thriffiley re sale of assets in QB (.1);	B130	PDS	0.30	180.00
1/16/2025	communication with A. Lowe re discovery information assistance.	B190	PDS	0.10	60.00
1/16/2025	Attention to state court litigation discovery requests	B190	BWA	0.30	150.00



1/16/2025	Review and analysis of proposed Highland Group insurance settlement (2.6); tc with Matt Jones, counsel for Highland Group (.2); revising insurance settlement agreement (1.2); tc with Trustee regarding same (.3); receive/review various NDA request issues (.5); tc with and emails from Mr. Dykes regarding pending issues (.3)	B130	WSR	5.70	3,420.00
1/16/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	0.50	250.00
1/16/2025	communication with D. Stewart re discovery sought in district court cases	B190	NJS	0.40	160.00
1/16/2025	Review/analyze dockets for district court cases where discovery is sought	B190	NJS	0.90	360.00
1/16/2025	Communication with counsel re: GOM NDA, analysis of issues (.70); Communication with J. Bailey re: TGS NDA redlines, analysis of same (.90); Analysis of Kroll destruction request (.20)	B190	BWA	1.80	900.00
1/16/2025	Communications with counsel for Cox in Miller suit re: status of discovery	B190	BAB	0.70	420.00
1/16/2025	phone call with K. Thompson (Hidden Assets) re employment application	B160	NJS	0.20	80.00
1/17/2025	analysis of potential litigation asset owned by non-debtor subsidiary Energy XXI Onshore, review of related pleadings, extensive negotiations with Lenders and M. Jones, multiple calls with M. Warner, and preparation of Chapter 7 filing.	B130	PDS	8.20	4,920.00
1/17/2025	Attention to CIMA Supplemental Doc Production; upload to Everlaw	B190	KAH	0.30	90.00
1/17/2025	Analysis of EXXI Onshore proposed Highlander Agreement issues; analysis of EXXI Onshore corporate issues (3.2); drafting Amended and Restated Operating Agreement (2.0); drafting LLC consent to file Ch 7 (.5)	B130	WSR	5.70	3,420.00
1/17/2025	Emails from Mr. Dykes regarding various issues; email to/from W&T; tc with Trustee regarding same	B130	WSR	0.70	420.00
1/17/2025	comparison of executed and unexecuted confidentiality agreement by GOM Shelf	B190	NJS	0.50	200.00
1/17/2025	Communication with GOM counsel re: NDA and document access, communication with paralegal and IT re: login credentials (1.30); Communication with Veritrust (.20)	B190	BWA	1.50	750.00
1/19/2025	review of, and comments and revisions to, revised stipulation with Lenders re carveout and application of funds.	B230	PDS	3.50	2,100.00
1/19/2025	Emails with client re: N. Miller litigation and discussion needs relating to same	B190	BAB	0.20	120.00
1/20/2025	Attention to January payables; update spreadsheet.	B210	KAH	0.20	60.00
1/20/2025	Draft Notice of Appearance for PDS in Energy XXI Onshore	B190	KAH	0.20	60.00
1/20/2025	review of, and comments and revisions to, proposed Lender stip and multiple related communications with M. Warner.	B230	PDS	5.20	3,120.00

1/20/2025	Attention to NRW document production; work with IT to download same; upload to Everlaw.	B130	KAH	0.70	210.00
1/20/2025	Providing document access to M. Bishop; multiple emails related to same.	B190	KAH	0.30	90.00
1/20/2025	Analysis of ownership of leases and wells relating to Hedron casualty and related communications with M. Warner and M. Bergeron (1.3); analysis of Ida claims and related communications with Lenders and M. Warner (.5); conference call re Hedron settlement (1.0);	B190	PDS	2.80	1,680.00
1/20/2025	Communication with GOM counsel and IT re: document access	B190	BWA	0.80	400.00
1/21/2025	review various asset sale issues (.6); conference with W&T regarding pending purchases (.3); emails regarding EXXI Onshore issues (.3)	B130	WSR	1.20	720.00
1/21/2025	Revising Exhibit A to Trustee's Notice of Abandonment of State Leases	B130	AWM	2.30	460.00
1/21/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	2.50	1,250.00
1/21/2025	Correspondence from TGS counsel re: NDA	B190	BWA	0.10	50.00
1/21/2025	Conducting research on 11 USC 541 relating to NRW motion	B130	AWM	0.30	60.00
1/22/2025	attend scheduled call to discuss N. Miller matter with B. Borwn	B190	NJS	0.40	180.00
1/22/2025	Review purchase status (.2); email regarding W&T issues (.2); review boarding agreement (.4); emails regarding NRW discovery issues (.5); emails from EXXI trustee (.2)	B130	WSR	1.50	975.00
1/22/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	3.80	2,090.00
1/22/2025	Review of documents produced by NRW, Array, and CIMA in preparation for upcoming hearing on relinquishment and abandonment.	B130	PDS	3.30	2,145.00
1/22/2025	Analysis of proposed Hedron settlement and related carveout for estate and contingency fee calculations and multiple related communications with M. Warner, B. Barriere, and L. Phillips.	B130	PDS	5.90	3,835.00
1/22/2025	Communications with M. Warner re: Miller litigation and need to discuss discovery issues	B190	BAB	0.50	325.00
1/22/2025	Emails with M. Borror re: status of 401k winddown (0.2); review and analyze documentary attachments outlining needs to terminate plan (0.8)	B220	BAB	1.00	650.00
1/22/2025	Conducting research on 11 USC 541 relating to NRW motion (4.9); Drafting research memo re same	B130	AWM	7.40	2,960.00
1/22/2025	Editing Exhibit A to Trustee's Notice of Abandonment of State Leases	B130	AWM	0.40	160.00
1/23/2025	Emails and analysis regarding asset sale and carveout issues (.5); review and analyze possible NRW stipulation / settlement / continuance (1.8); review and analyze records request from TGS (.4)	B130	WSR	0.00	0.00

1/23/2025	Review and analyze debtors' documents and emails, third party document productions (1); draft stipulation re: abandonment motion (4.1).	B130	JDC	5.10	2,805.00
1/23/2025	review of, and comments and revisions to, tri-party settlement agreement and related communications with M. Warner and Fishman team (.9) preparation for upcoming hearing on relinquishment and abandonment and related communications with A. Mendez, J. Cangelosi, and M. Warner (2.4); communication with B. Barriere and L. Philips re Hedron settlement statement (.3); conference call with M. Warner and Fishman team re tri-party agreement and related communications with B. Barriere and L. Phillips (1.4); communication with Interior re Relinquishment and Abandonment Motion (.1); review of, and comments and revisions to, proposed NRW stipulation and related communications with A. Mendez, R. Kuebel, J. Cangelosi and W. Robbins (2.5).	B130	PDS	7.60	4,940.00
1/23/2025	Review request from litigant to obtain records from estate, begin analysis of issues relating to same	B190	BAB	0.50	325.00
1/23/2025	Communication with J. Bailey (TGS) re: NDA and document access, analysis of same	B190	BWA	0.30	165.00
1/24/2025	Attention to payables; update spreadsheet.	B210	KAH	0.10	30.00
1/24/2025	Preparing exhibits for Relinquish/Abandon motion hearing; multiple emails re same	B190	KAH	0.70	210.00
1/24/2025	Analysis of NRW stipulation issues (1.2)); review / revise proposed stipulation / continuance (1.3); review and analyze GOM Shelf issues and assets / ownership lists (1.0); conference with GOM Shelf counsel regarding same (.4); email to Trustee regarding pending issues (.3); tc and email with Mr. Dykes regarding pending issues (.3)	B130	WSR	4.10	2,665.00
1/24/2025	Review and analyze debtors' documents and emails, third party document productions, communications with B. York re: deficient production (3.2); revise witness and exhibit list, stipulation for abandonment motion (.3).	B130	JDC	3.50	1,925.00
1/24/2025	review of, and comments and revisions to, Hedron settlement agreement and related communications with M. Warner and M. Bergeron.	B190	PDS	1.50	975.00
1/24/2025	Draft/revise proposed settlement with NRW and related communications with M. Warner, A. Mendez, R. Lamb, and R. Kubel.	B130	PDS	5.80	3,770.00
1/25/2025	Prepare for upcoming hearing on relinquishment and abandonment and revisions to witness and exhibit list and related communications with M. Warner and R. Dykes.	B130	PDS	4.20	2,730.00
1/25/2025	Attention to TGS NDA redlines	B190	BWA	0.20	110.00
1/26/2025	Review and revise witness and exhibit list, prepare for upcoming hearing on relinquishment and abandonment and related communications with M. Warner (8.9); review of, and comments and revisions to, updated settlement package from Fishman re Hedron suit and related communications with Fishman and M. Warner (.8).	B130	PDS	9.70	6,305.00
1/26/2025	Communication with J. Bailey and TGS team re: scheduling NDA call	B190	BWA	0.30	165.00



1/27/2025	Review/analyze NRW objection to Trustee's abandonment motion	B130	NJS	0.20	90.00
1/27/2025	Conducting research on abandonment of estate property	B130	AWM	0.80	320.00
1/27/2025	Review and analyze various evidentiary and other issues arising in NRW hearing (3.8); email to/from W&T Counsel (.3); review USA, GOM Shelf, NRW and MacMoRan objections to abandonment (1.5); tc with counsel for GOM Shelf (.2); review and analyze abandonment and other Midlantic issues (1.8); tc with Mr. Dykes regarding motion issues (.3)	B130	WSR	7.80	5,070.00
1/27/2025	Review and analyze debtors' documents and emails, third party document productions.	B130	JDC	1.60	880.00
1/27/2025	Review, revise and finalize witness and exhibit list (3.5), prepare for upcoming hearing on relinquishment and abandonment (5.4) and related communications with M. Warner (1.1), R. Kuebel (.6); R. Lamb (.1), R. Dykes (.8).	B130	PDS	11.50	7,475.00
1/27/2025	Prepare for and participate in telephone conference with counsel for TGS re: document availability, analyze issues arising from request, telephone conference with P Scharf re: same, review documents on underlying suit provided by Scharf	B190	BAB	1.80	1,170.00
1/27/2025	Assist with preparation for hearing on motion to abandon remaining legal title over NRW leases (0.8), review and analysis of GOM Shelf opposition (0.5); NRW opposition to same (0.6); USA objection (0,8)	B130	BAB	2.70	1,755.00
1/27/2025	Revisions to Witness/Exhibit List; preparing exhibits.	B130	KAH	1.80	540.00
1/27/2025	Preparing exhibit binders and hearing pleadings.	B130	KAH	4.20	1,260.00
1/27/2025	Conducting research on evidentiary issues relating to NRW motion.	B130	AWM	6.70	2,680.00
1/27/2025	Telephone conference and email communication with TGS counsel re: NDA issues, analysis of same (.90); Communication with A. Carr re: GOM Shelf NDA and document access request (.30); Communication with Kroll re: destruction (.10)	B190	BWA	1.30	715.00
1/27/2025	Analyze exhibit redaction issue	B130	BWA	0.80	440.00
1/28/2025	Attend hearing on MT Relinquish and Abandon to assist with exhibits.	B190	KAH	3.80	1,140.00
1/28/2025	Emails with PI counsel re: N. Miller discovery issues, email to client re: same	B190	BAB	0.30	195.00
1/28/2025	Travel to/from hearing on MT Abandon (9); conferences and analysis regarding hearing issues (2); attend hearing (4) (1/2 travel)	B130	WSR	10.50	6,825.00
1/28/2025	Communication with GOM shelf re: additional credentials, analysis of same	B190	BWA	0.60	330.00
1/28/2025	Prepare for and attend hearing on relinquishment and abandonment in Houston (1/2 travel).	B130	PDS	10.50	6,825.00
1/29/2025	Revisions to November invoice.	B160	KAH	0.70	210.00
1/29/2025	Review and analyze debtors' documents and emails, third party document productions, summarize findings.	B130	JDC	4.50	2,475.00

1/29/2025	Analysis of potential employment of additional professionals	B160	BWA	0.60	330.00
1/29/2025	communication with R. Dykes re decommissioning orders (.1); multiple communications with M. Warner re strategy moving forward with NRW and other issues (1.4); communication with R. Kuebel re NRW settlement options (.6); planning and strategy regarding course forward for NRW - US negotiations and abandonment (2.3).	B130	PDS	4.40	2,860.00
1/29/2025	Telephone conference with M. Warner re: 401k winddown issues, emails with M. Borror re: same	B220	BAB	0.50	325.00
1/29/2025	Prepare transcript order; make arrangements for same; emails to/from court reporter.	B130	KAH	0.30	90.00
1/29/2025	Review Chevron bond demand letters (.4); review and analyze Devon Bond issues (.5); review and analyze Spectrum collection offer (.5); emails from W&T Counsel (.3); review NRW document demand and analysis regarding same (.4); email and analysis regarding various other document requests (.4).	B130	WSR	2.50	1,625.00
1/29/2025	Communication with Kroll and Trustee re: Kroll's request to destroy (1.10); Analysis of NRW's request for documents and proposed NDA (.30); Communication with GOM re: additional credentials, analysis of same (.50); Communication with A. Carr re: requests for access (.50)	B190	BWA	2.40	1,320.00
1/30/2025	Continued revisions to November invoice.	B160	KAH	0.90	270.00
1/30/2025	email to B. Altazan and D. Stewart re employment of personnel to pursue unclaimed assets	B160	NJS	0.10	45.00
1/30/2025	discussion with W. Robbins re employment of personnel to pursue unclaimed assets	B160	NJS	0.10	45.00
1/30/2025	zoom call with D. Stewart, and B. Altazan re Hidden Assets employment and non-testifying expert for special counsel	B160	NJS	0.30	135.00
1/30/2025	prepare for call with D. Stewart and B. Altazan re employment of Hidden Assets and expert	B160	NJS	0.20	90.00
1/30/2025	Analysis of potential employment of additional professionals	B160	BWA	0.30	165.00
1/30/2025	Email to Kroll re: specifics of documents they seek to destroy	B110	BWA	0.10	55.00
1/30/2025	Telephone call with Talos regarding SL release; telephone call with W&T regarding sale issues and other pending pipeline issues (.7); review and analyze Winkler / Spectrum collection issue and teleconference with Mr. Dykes regarding same (2.5); email to Mr. Warner regarding same (.4); consider carveout issues (.6)	B130	WSR	4.20	2,730.00

1/30/2025	communication with B. Barriere and M. Warner re NRW and Hedron issues (1.8); communication with L. Phillips re Lenders' stipulation and other issues (.5); communication with N. Smeltz and B. Altazan re various employment issues (.4); communication with M. Warner and W. Robbins re Stone Pigman files and potential assets therein (.4);communication with B. Dassa re NRW funds (.1); review of, and comments and revisions to, Hedron scheduling order and related communications with B. Barriere and M. Warner (.3);	B190	PDS	2.50	1,625.00
1/30/2025	Communication with R. Kuebel re NRW resolution	B130	PDS	0.20	130.00
1/31/2025	Preparing spreadsheet of outstanding payables and professional fees for B. Dassa	B210	KAH	0.60	180.00
1/31/2025	tc with Spectrum regarding collection and other case issues (.3); tc with Army Long regarding property for purchase and other issues (.2); consider tax sale issues (.4); consider lien issues for EXXI Onshore (.3); emails to/from Trustee regarding NRW issues (.2)	B130	WSR	1.40	910.00
1/31/2025	Attention to and communication with GOM counsel re: document access	B110	BWA	0.30	165.00
1/31/2025	communication with M. Warner re potential chapter 5 COA.	B180	PDS	0.20	130.00
1/31/2025	Emails with M. Borrer re: 401k plan winddown status	B220	BAB	0.20	130.00
1/31/2025	Telephone conferences with client, R. Dykes, C. Sonnier re: Miller suit, discovery issues	B190	BAB	1.40	910.00
1/31/2025	Telephone calls with Jefferson Parish Sheriff's Office and City of Grand Isle re Energy XXI Onshore bankruptcy/stay in place prohibiting tax sales; correspondence to both regarding same; emails with W. Robbins re same.	B130	KAH	0.50	150.00
<b>Total</b>				<b>408.70</b>	<b>\$216,810.00</b>

**FEE EARNER SUMMARY**

<b>Fee Earner</b>	<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
PDS Paul Douglas Stewart, Jr.	136.50	624.65	85,265.00
WSR William S. Robbins	75.30	621.25	46,780.00
AWM Abigail W. Mock	49.90	261.32	13,040.00
BAB Brandon A. Brown	28.20	615.78	17,365.00
BWA Brooke W. Altazan	23.20	515.52	11,960.00
JDC Jamie D. Cangelosi	53.70	517.23	27,775.00
KAH Kimberly A. Heard	22.00	300.00	6,600.00
NJS Nicholas J. Smeltz	19.90	403.27	8,025.00

**TASK SUMMARY**

<b>Task</b>	<b>Hours</b>	<b>Effective Rate</b>	<b>Amount</b>
B110 Case Administration	1.30	515.38	670.00
B120 Asset Analysis and Recovery	0.10	400.00	40.00
B130 Asset Disposition	328.50	537.95	176,715.00
B140 Relief from Stay/Adequate Protection Proceedings	1.90	400.00	760.00
B150 Meetings of and Communications with Creditors	2.50	500.00	1,250.00
B160 Fee/Employment Applications	6.60	396.97	2,620.00
B180 Avoidance Action Analysis	0.20	650.00	130.00
B190 Other Contested Matters(excluding assumptions/reje	52.20	495.98	25,890.00
B210 Business Operations	2.90	396.55	1,150.00
B220 Employee Benefits/Pensions	1.90	644.74	1,225.00
B230 Financing/Cash Collections	9.90	600.00	5,940.00
B310 Claims Administration and Objections	0.70	600.00	420.00

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
1/14/2025	Texas Secretary of State database fees for entity inquiries	1.00
1/17/2025	Filing fee	338.00
1/29/2025	Mileage to/from Houston and parking to SDTX Courthouse for 1/27/2025 hearing in Cox	416.60
1/29/2025	Transcript of hearing re: Trustee's Motion to Relinquish and Abandon	912.60
1/31/2025	Copies for January 2025	1,609.20
1/31/2025	Everlaw for January 2025	107.00
1/31/2025	Everlaw-ECA for January 2025	29.96
1/31/2025	Pacer for January 2025	125.20
1/31/2025	Project manager time	450.00
1/31/2025	Project manager time	225.00
<b>Total DISBURSEMENTS</b>		<b>\$4,214.56</b>

**PAYMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
5/14/2025	Wire from MLCJR LLC	800,000.00
<b>Total PAYMENTS</b>		<b>\$800,000.00</b>

New Charges

\$221,024.56

Previous Balance	\$1,204,581.38
Payments	<u>-\$800,000.00</u>
<b>Balance Forward</b>	<b>\$404,581.38</b>
 <b>Balance Due</b>	 <b><u>\$625,605.94</u></b>

**Trust Statement**

Date	Description	Receipts
4/2/2025	Williams Companies and its subsidiaries, including Discovery Gas Transmission	33,700.00
	Settlement of Williams Companies and its subsidiaries, including Discovery Gas Transmission	
	<b>Total</b>	<hr/> <b>\$33,700.00</b>
	<b>Trust Balance</b>	<b>\$33,700.00</b>